



January 9, 2009

VIA CERTIFIED MAIL

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**Re: DECEMBER 2008 MONTHLY REPORT
RI/FS & REMEDIAL DESIGN & REMOVAL ACTION
NEASE CHEMICAL SITE
SALEM, OHIO**

In accordance with Paragraph X E of the Administrative Order by Consent regarding a Remedial Investigation/Feasibility Study (RI/FS) of the Nease Chemical Site in Salem, Ohio, attached is a copy of the December 2008 RI/FS Progress Report. This report also includes the monthly progress report for the remedial design (OU-2) in accordance with Paragraph X of the Administrative Order on Consent, effective as of May 10, 2006.

Additionally, in accordance with Paragraph 14 of the Administrative Order by Consent, signed December 17, 1993, attached is a copy of December 2008 Removal Action Progress Report.

Sincerely,

A handwritten signature in black ink that reads "Rainer F. Domalski".

Dr. Rainer F. Domalski
Site Coordinator

Enclosures

cc M. Hardy/Heidi Goldstein – Thompson Hine
Steve Finn – Golder Associates, Inc.

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US EPA RECORDS CENTER REGION 5



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**NEASE CHEMICAL SITE, SALEM, OHIO
REMEDIAL INVESTIGATION/FEASIBILITY STUDY
REMEDIAL DESIGN (OU-2)
MONTHLY PROGRESS REPORT
DECEMBER 2008**

1. INTRODUCTION

This progress report has been prepared in accordance with Paragraph XE of the Administrative Order of Consent (AOC) regarding a Remedial Investigation/Feasibility Study (RI/FS) and Paragraph X of the Administrative Order on Consent regarding the Remedial Design (RD/OU-2) of the Nease Chemical Site in Salem, Ohio. The report summarizes the major RI/FS and RD actions during the month along with investigation results and any problems encountered in the project. Activities planned for next month are also presented

2 SUMMARY OF ACTIVITIES PERFORMED

2.1 PROJECT ACTIVITY SUMMARY

The activities that were initiated and/or completed during the month are described. All activities were performed in accordance with the detailed protocol provided in the approved Work Plan.

2.2 FIELDWORK

2.2.1 RI/FS

None.

2.2.2 RD (OU-2)

None

2.3 Reports

2.3.1 RI/FS

The final Record of Decision (ROD) for OU-3 was signed by the agency on September 24, 2008.

2.3.2 RD (OU-2)

Baseline Technical Memorandum Report

- Conference call with agencies regarding additional mirex soil sampling in surface soil including multi-incremental sampling approaches.
- Completed Vapor Intrusion and response to tech memo comments; under internal review.
- Evaluate underground utilities as potential pathway for vapor intrusion, develop a map with utilities, additional vapor sampling in one residential home.

2 4 MEETINGS

None.

3 VARIATIONS FROM THE APPROVED WORK PLAN

None

4 RESULTS OF SAMPLING, TESTS AND ANALYSES

Results from sampling events were and will be provided to the agencies in specific reports.

5 PROJECT SCHEDULE

The current Work Plan schedule identifies completion and target dates for project activities. Those scheduled to occur over the next several months include:

- Finalize PDI work incl. Technical Memoranda.
- Start Remedial Design Workplan

6 DIFFICULTIES ENCOUNTERED AND ACTION TAKEN TO RESOLVE PROBLEMS

No significant difficulties were encountered.

7 PERSONNEL CHANGES

None

8 ANTICIPATED PROJECT ACTIVITIES FOR JANUARY 2009

- Monthly Progress Report December 2008
- RD (OU-2)
 - Baseline Technical Memorandum Report –
 - Response to agency recommendations and considerations and for implementation of interim measures for the removal of NAPL at TW06-21.
 - Submit Vapor Intrusion Assessment and Mitigation Report based on agency comments.
 - Submit letters to adjacent property owner's presenting the sampling results and boring logs for monitoring wells installed in their property.
 - Bedrock contour map.
 - Utility Site Map

TABLE 1
NEASE CHEMICAL SITE, SALEM, OHIO
RI/FS AND RD (OU-2) SCHEDULE

DATE	TASK/ACTIVITY/DELIVERABLE/MILESTONE	
	RI/FS	RD (OU-2)
	Documentation of the Site Activities through July 31, 2004 can be reviewed in the July 2004 Monthly Progress Report	
August 30, 2004	US EPA Region VI/ OEPA approve Endangerment Assessment	
September 1, 2004	Draft Feasibility Study (OU-2) submitted to the agencies for review	
September 9, 2004	Submit Monthly Progress Report	
September 13, 2004	Submit Final Revision to Endangerment Assessment	
October 8, 2004	Submit Monthly Progress Report	
November 10, 2004	Submit Monthly Progress Report	
November 22, 2004	Received Agencies' comments for draft FS (OU-2)	
December 10, 2004	Submit Monthly Progress Report	
January 10, 2005	Submit Monthly Progress Report	
February 10, 2005	Submit Monthly Progress Report	
March 1, 2005	Final Draft Feasibility Study (OU-2) submitted to agencies for review	
March 4, 2005	Submit Monthly Progress Report	
April 8, 2005	Submit Monthly Progress Report	
April 21, 2005	US EPA Region VI/OEPA approve Final Feasibility Study for OU-2	
May 9, 2005	Submit Monthly Progress Report	
May 31, 2005	US EPA Region V published the Proposed Remedial Action the OU-2 (onsite)	
June 9, 2005	Submit Monthly Progress Report	
July 8, 2005	Submit Monthly Progress Report	
August 10, 2005	Submit Monthly Progress Report	
Aug. 1 – 15, 2005	MFLBC – Reconnaissance of sediment bodies	
September 9, 2005	Submit Monthly Progress Report	
September 29, 2005	US EPA Region V signs Final Record of Decision for OU-2	
Oct. 10, 2005	Submit Monthly Progress Report	

DATE	TASK/ACTIVITY/DELIVERABLE/MILESTONE	
	R/IFS	RD (OU-2)
November 9, 2005	Submit Monthly Progress Report	
December 8, 2005	Submit Monthly Progress Report	
January 9, 2006	Submit Monthly Progress Report	
February 8, 2006	Submit Monthly Progress Report	
March 15, 2006	Submit Monthly Progress Report	
April 10, 2006	Submit Monthly Progress Report	
May 8, 2006	Submit Monthly Progress Report	
May 10, 2006		Administrative Order on Consent for OU-2 Remedial Design effective
May 25, 2006		Submittal of draft PDI Workplan
June 8, 2006	Submit Monthly Progress Report	
June 9, 2006		ACO Financial Assurance – Trust Fund placed
June 28, 2006		US EPA comments to draft PDI workplan received
July 10, 2006	Submit Monthly Progress Report	
July 12, 2006		Sampling of well PZ-6B-U
Aug. 1, 2006		Submit revised PDI Workplan
Aug 4, 2006	Submit Monthly Progress Report	
Aug 21, 2006		Commenced with PDI Fieldwork
Aug. 28, 2006		Conditional Approval of PDI Workplan
Sept 8, 2006	Submit Monthly Progress Report	
Sept. 18, 2006	Soil Sampling in the MFLBC Flood Plain	
Sept. 27, 2006		Submit Final PDI Workplan incl response to agencies' comments
October 8, 2006	Submit Monthly Progress Report	
Nov. 6, 2006	Submit Monthly Progress Report	
Dec. 12, 2006	Submit Monthly Progress Report	
Dec 13, 2006	OU-3 Meeting in US EPA Chicago Office	
Jan 8, 2007	Submit Monthly Progress Report	
Febr 6, 2007	Submit Monthly Progress Report	
March 7, 2007		Submittal S/S/S Treatability Study Report through Phase III
March 19, 2007	Submit Monthly Progress Report	
March 22, 2007		Submittal Proposal Bio-Treatability Study for Benzene in Groundwater
April 4, 3007	Submit Monthly Progress Report	
May 21, 2007	Submit Monthly Progress Report	
June 7, 2007	Submit Monthly Progress Report	

DATE	TASK/ACTIVITY/DELIVERABLE/MILESTONE
June 13, 2007	Submit Technical Memorandum – Baseline Conditions to agencies
June 30, 2007	Installed Sub-slab Vapor Systems at two residential homes
July 6, 2007	Submit Monthly Progress Report
August 1, 2007	Agencies' approval for Phase IV S/S/S Treatability Study
Aug. 7, 2007	Submit Monthly Progress Report
September 24, 2007	Submit Monthly Progress Report
October 5, 2007	Submit Monthly Progress Report
November 7, 2007	Submit Monthly Progress Report
December 12, 2007	Submit Interim Deliverable for OU-3 FS
December 21, 2007	Submit Monthly Progress Report
January 3, 2008	Submit Monthly Progress Report
February 7, 2008	Submit Monthly Progress Report
February 28, 2008	<ul style="list-style-type: none"> o Letter to agencies about Proposed Mirex Analysis of discrete soil samples o Memo to agencies regarding Analytical Laboratories for Mirex Testing
February 29, 2008	Submit Vapor Intrusion Report to agencies
March 3, 2008	Submit Monthly Progress Report
March 11, 2008	Submit S/S/S Treatability Study to agencies
March 14, 2008	Submit NZVI Pilot Study to agencies
March 20, 2008	Submit Draft FS (OU-3) to agencies
April 8, 2008	Submit Monthly Progress Report
May 7, 2008	Submit Monthly Progress Report
June 5, 2008	Received Agencies' Comments to Draft FS (OU-3) Submit Revised Final FS (OU-3) to Agencies
June 12, 2008	Submit Monthly Progress Report
June 30, 2008	Received approval of Final FS (OU-3)
July 7, 2008	Submit Monthly Progress Report
July 14 – Aug 13, 2008	Public comment period (OU-3/PRAP)
July 31, 2008	Public Meeting (OU-3/PRAP)
Aug 28, 2008	Submit Monthly Progress Report

DATE	TASK/ACTIVITY/DELIVERABLE/MILESTONE
Sept 11, 2008	Submit Monthly Progress Report
Sept. 24, 2008	OU-3 Record of Decision signed by agency
Oct 28, 2008	Submit Monthly Progress Report
Nov. 5, 2008	Submit Discrete Soil Sample Mirex Results to agencies
Nov 11, 2008	Submit Monthly Progress Report
Dec 22, 2008	Submit Monthly Progress Report
Jan. 9, 2009	Submit Monthly Progress Report

**NEASE CHEMICAL SITE, SALEM, OHIO
REMOVAL ACTION
MONTHLY PROGRESS REPORT
DECEMBER 2008**

1.0 INTRODUCTION

This progress report has been prepared in accordance with Paragraph 14 of the "Order" section of the Administrative Order by Consent (AOC) Docket No. V-W-94-C-212, effective November 17, 1993 regarding a Removal Action for the Nease Chemical Site in Salem, Ohio. The report summarizes the major activities during the month along with investigation results and any problems encountered on the project. Activities planned for next month are also presented.

2.0 SUMMARY OF ACTIVITIES PERFORMED

2.1 PROJECT ACTIVITY

The activities that were initiated and/or completed during this month are described below. Activities were performed in accordance with the Removal Action AOC.

Ohio EPA performed a RCRA Site inspection during this month. The inspection from OEPA was received with a letter dated June 20, 2008.

The following work was performed:

- OEPA approved the tank closure in a letter dated December 24, 2008.
- Golder took an inventory of every container in the warehouse on the Salem Site. The waste was classified appropriately – non-hazardous/hazardous. The disposal of the waste will be performed in January 2009.
- In the future, the classification of the waste will be handled through Golder, ROC's technical consultant.
- Several old activated carbon units will be scrapped after thorough cleanup.

Also Golder evaluated the performance of the groundwater treatment system and the carbon change-out schedule,

2.2 WORK PLAN PREPARATION/REPORTS

None

2.3 FIELDWORK

2.3.1 SITE INSPECTIONS

The results of the monthly site inspection carried out at the site on December 30, 2008 are shown in Attachment 1.

2.3.2 MONTHLY WATER LEVEL MEASUREMENTS

The next water level monitoring in wells will occur in January 2009.

2.3.3 TREATMENT PLANT OPERATION

The treatment plant operated mostly normal throughout the month

2.4.1.1 MEETINGS

None

3.0 VARIATIONS FROM THE APPROVED REMOVAL ACTION WORK PLAN

None

4.0 RESULTS OF INSPECTIONS, ENVIRONMENTAL SAMPLING, TESTS AND ANALYSES

Water monitoring samples were collected from the treatment plant on December 2 and 16, 2008 (Attachments 2 and 3). The second monthly sampling result was not available for this report. The next acute/chronic toxicity evaluations will be conducted in February 2009.

5.0 PROJECT SCHEDULE

None.

6.0 DIFFICULTIES ENCOUNTERED AND ACTION TAKEN TO RESOLVE PROBLEMS

None

7.0 PERSONNEL CHANGES

None

8.0 TYPES AND QUANTITIES OF REMOVED MATERIALS

For the period from November 1 through 30, 2008 the following material was removed.

- 10,400 gallons of leachate and/or backwash water were disposed off-site during this month.
- Approximately 184,349 gallons were pumped from Leachate Collection System 1 (LCS-1) (total for LCS-1 = 22,189,830 gal).
- 10,529 gallons were pumped from Leachate Collection System 2 (LCS-2) (total for LCS-2 = 1,748,743 gal).

- No water was pumped from Pond 1 (total for the pond = 1,034,375 gallons).
- Approximately 18 pounds of organic compounds were removed during pumping (estimate based on average VOC/SVOC concentrations for each source).

9.0 ANTICIPATED PROJECT ACTIVITIES FOR JANUARY 2009

Removal Action activities scheduled for the upcoming month include on-going implementation of the approved Removal Action Work Plan involving:

- Collection of groundwater from the existing collection systems LCS-1, LCS-2 and Pond 1.
- Monthly Progress Report for December 2008

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TABLE 1
NEASE CHEMICAL SITE, SALEM, OHIO
REMOVAL ACTION SCHEDULE

DATE	TASK/ACTIVITY/DELIVERABLE/MILESTONE
	Documentation of the Site Activities through July 31, 2004 can be reviewed in the July 2004 Monthly Progress Report
September 9, 2004	Submit Monthly Progress Report
October 8, 2004	Submit Monthly Progress Report
November 10, 2004	Submit Monthly Progress Report
December 10, 2004	Submit Monthly Progress Report
January 10, 2005	Submit Monthly Progress Report
February 10, 2005	Submit Monthly Progress Report
March 4, 2005	Submit Monthly Progress Report
April 8, 2005	Submit Monthly Progress Report
May 9, 2005	Submit Monthly Progress Report
June 9, 2005	Submit Monthly progress Report
July 8, 2005	Submit Monthly Progress Report
August 10, 2005	Submit Monthly Progress Report
September 9, 2005	Submit Monthly Progress Report
October 10, 2005	Submit Monthly Progress Report
November 9, 2005	Submit Monthly Progress Report
December 8, 2005	Submit Monthly Progress Report
January 9, 2006	Submit Monthly Progress Report
February 8, 2006	Submit Monthly Progress Report
March 15, 2006	Submit Monthly Progress Report
April 10, 2006	Submit Monthly Progress Report
May 8, 2006	Submit Monthly Progress Report
June 8, 2006	Submit Monthly Progress Report
July 10, 2006	Submit Monthly Progress Report
August 4, 2006	Submit Monthly Progress Report
September 8, 2006	Submit Monthly Progress Report
October 8, 2006	Submit Monthly Progress Report
November 6, 2006	Submit Monthly Progress Report
December 12, 2006	Submit Monthly Progress Report
January 8, 2007	Submit Monthly Progress Report
February 6, 2007	Submit Monthly Progress Report
March 19, 2007	Submit Monthly Progress Report
April 4, 2007	Submit Monthly Progress Report
May 21, 2007	Submit Monthly Progress Report

DATE	TASK/ACTIVITY/DELIVERABLE/MILESTONE
June 7, 2007	Submit Monthly Progress Report
July 6, 2007	Submit Monthly Progress Report
July 2-14, 2007	Implement Treatment Plant Modifications
August 7, 2007	Submit Monthly Progress Report
Sept. 14, 2007	Submit Monthly Progress Report
October 5, 2004	Submit Monthly Progress Report
November 7, 2007	Submit Monthly Progress Report
December 21, 2007	Submit Monthly Progress Report
January 3, 2008	Submit Monthly Progress Report
February 7, 2008	Submit Monthly Progress Report
March 3, 2008	Submit Monthly Progress Report
April 8, 2008	Submit Monthly Progress Report
May 7, 2008	Submit Monthly Progress Report
June 12, 2008	Submit Monthly Progress Report
July 7, 2008	Submit Monthly Progress Report
Aug. 28, 2008	Submit Monthly Progress Report
Sept. 11, 2008	Submit Monthly Progress Report
October 28, 2008	Submit Monthly Progress Report
November 6, 2008	Submit Monthly Progress Report
Dec. 22, 2008	Submit Monthly Progress Report
Jan. 9, 2009	Submit Monthly Progress Report

ATTACHMENT 1

**RESULTS OF MONTHLY SITE INSPECTION
NEASE CHEMICAL SITE, SALEM, OHIO
DECEMBER 2008**

SITE INSPECTION FORM
RUETGERS-NEASE CORPORATION
 Nease Site, Salem, Ohio

Date of Inspection: 12-30-08

Entry Time: 1100 Hrs. Exit Time: 1400 Hrs

Weather: CLOUDY 36°

Inspector's Name: DENNIS L. LANE

Inspector's Company: Howells and Baird, Inc.

INSPECTION RESULTS

SPECIFIC OBSERVATIONS: Structures

(Responses: S = Satisfactory U = Unsatisfactory Yes/No Levels Measured in Feet. N/A = Not Applicable)

	Pump	Quick-Connect	Water Level	Berm Erosion	Visible Leakage
Leachate Collection System 1 (LCS-1)	S	S	6.70	N/A	No
Leachate Collection System 2 (LCS-2)	S	S	12.33	N/A	No
Pond 1 Pumphouse	S	S	9.81	N/A	No
Pond 1 Berm	N/A	N/A	N/A	No	No
Pond 2 Embankment	N/A	N/A	N/A	No	No
Exclusion Area A Embankment	N/A	N/A	N/A	No	No
Storage Tank	N/A	S	5.69	N/A	No
Other (specify)					

SPECIFIC OBSERVATIONS

Sediment Barriers

Condition of Sediment Barriers

Barrier ID	Fabric Intact?	By Passing Evident?	Is Maintenance Necessary?
Sediment Control Structure 1	YES	No	No
Sediment Control Structure 2	YES	No	No
Fabric Barrier 2	YES	No	No
Fabric Barrier 3	YES	No	No
Fabric Barrier 4	YES	No	No
Fabric Barrier 5	YES	No	No
Fabric Barrier 8	YES	No	No
Fabric Barrier 9	YES	No	No
Fabric Barrier 10	YES	No	No
Rock Barrier 1	YES	No	No
Rock Barrier 2	YES	No	No
Pond 7 - North	YES	No	No
Pond 7 - South	YES	No	No

SPECIFIC OBSERVATIONS:

Seeps (if present, use more forms, as necessary)

Seep ID (yr-month-#)	Located on Map	Areal Extent (ft ²)	Magnitude (flow?, ponding?)
94-7-1	YES	20	Non-Flowing Seep
96-8-2	YES	20	Non-Flowing Seep

Note: Seep ID # equal the nth observed seep during the yr-month in question.

ADDITIONAL OBSERVATION OR REMARKS:

Inspector's Name: DENNIS L. LANEInspector's Signature: Dennis L. LaneDate: 12-30-08

ATTACHMENT 2

**WATER SAMPLING RESULTS – DECEMBER 2, 2008
NEASE CHEMICAL SITE, SALEM, OHIO**

ANALYTICAL REPORT

SALEM, OHIO SITE

Lot #: A8L030150

Dr. Rainer Domalski

Rutgers Organics Corporation
201 Struble Road
State College, PA 16801

TESTAMERICA LABORATORIES, INC.



Kenneth J. Kuzior
Project Manager
ken.kuzior@testamericainc.com

Approved for release
Kenneth J. Kuzior
Project Manager
12/16/2008 3:47 PM

December 16, 2008

TestAmerica Laboratories, Inc.

TestAmerica North Canton 4101 Shuffel Street NW, North Canton, OH 44720

Tel (330)497-9396 Fax (330)497-0772 www.testamericainc.com



SAMPLE SUMMARY

A8L030150

WO #	SAMPLE#	CLIENT SAMPLE ID	SAMPLED DATE	SAMP TIME
K30GN	001	INFLUENT	12/02/08	13:00
K30GQ	002	OUTFALL	12/02/08	13:00

NOTE (S) :

- The analytical results of the samples listed above are presented on the following pages
- All calculations are performed before rounding to avoid round-off errors in calculated results
- Results noted as "ND" were not detected at or above the stated limit
- This report must not be reproduced, except in full, without the written approval of the laboratory
- Results for the following parameters are never reported on a dry weight basis color, corrosivity, density, flashpoint, ignitability, layers, odor, paint filter test, pH, porosity pressure, reactivity, redox potential, specific gravity, spot tests, solids, solubility, temperature, viscosity, and weight

Rutgers Organics Corporation

Client Sample ID: INFLUENT

General Chemistry

Lot-Sample #...: A8L030150-001 Work Order #...: K30GN
Date Sampled...: 12/02/08 13:00 Date Received...: 12/03/08

Matrix.....: WG

PARAMETER	RESULT	RL	UNITS	METHOD	PREPARATION- ANALYSIS DATE	PREP BATCH #
Nitrate as N	0.10	0.10	mg/L	MCAWW 300.0A	12/04/08	8343072
		Dilution Factor: 1				
Nitrite as N	ND	0.10	mg/L	MCAWW 300.0A	12/04/08	8343073
		Dilution Factor: 1				
Nitrogen, as Ammonia	ND	2.0	mg/L	MCAWW 350.2	12/11/08	8346326
		Dilution Factor: 1				
Total phosphorus	ND	0.1	mg/L	MCAWW 365.2	12/04/08	8339444
		Dilution Factor: 1				

Rutgers Organics Corporation

Client Sample ID: OUTFALL

General Chemistry

Lot-Sample #...: A8L030150-002 Work Order #...: K30GQ Matrix.....: WG
 Date Sampled...: 12/02/08 13:00 Date Received...: 12/03/08

PARAMETER	RESULT	RL	UNITS	METHOD	PREPARATION- ANALYSIS DATE	PREP BATCH #
Nitrate as N	ND	0.10	mg/L	MCAWW 300.0A	12/04/08	8343072
		Dilution Factor: 1				
Nitrite as N	ND	0.10	mg/L	MCAWW 300.0A	12/04/08	8343073
		Dilution Factor 1				
Nitrogen, as Ammonia	ND	2.0	mg/L	MCAWW 350.2	12/11/08	8346326
		Dilution Factor 1				
Total phosphorus	ND	0.1	mg/L	MCAWW 365.2	12/04/08	8339444
		Dilution Factor 1				

ATTACHMENT 3

**WATER SAMPLING RESULTS – DECEMBER 16, 2008
NEASE CHEMICAL SITE, SALEM, OHIO**

(to be reported in February 2009)